

MATTHEW J. SHIER (SBN: 72638)  
JEREMY W. KATZ (SBN: 119418)  
PINNACLE LAW GROUP LLP  
425 California Street, Suite 1800  
San Francisco, CA 94104  
Telephone: (415) 394-5700  
Facsimile: (415) 394-5003

Attorneys for  
TV-32 DIGITAL VENTURES INC.,  
Debtor and Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In re:  
  
TV-32 DIGITAL VENTURES INC., a  
California corporation,  
Tax ID: 20-1198608  
  
Debtor.

Case No. 09-58098 ASW 11

Chapter 11

DEBTOR'S CHAPTER 11 STATUS  
CONFERENCE STATEMENT

Date: June 28, 2011  
Time: 2:00 p.m.  
Courtroom: 3020, 3<sup>rd</sup> Floor  
The Honorable Arthur S. Weissbrodt

TO: THE HONORABLE ARTHUR S. WEISSBRODT, UNITED STATES BANKRUPTCY  
JUDGE:

TV-32 DIGITAL VENTURES INC., Debtor and Debtor-in-Possession (the "Debtor")  
hereby respectfully submits its Chapter 11 Status Conference Statement in connection with the  
status hearing referenced above.

**I. Case Status**

Sterling has completed its foreclosure sale of the property located at 1010 Corporation  
Way, Palo Alto, California. There is no longer any basis for a Chapter 11 Plan and the Debtor  
intends to seek dismissal of this case if the Court is not prepared to dismiss it at this time. There  
are no assets to administer and conversion of the case to Chapter 7 will serve no purpose.

1 In the meantime, Mr. Wade—as distinguished from the Debtor—has been involved in  
2 various litigation with Sterling, the SBA and KMTP, as follows, all of which now appears to be  
3 moot:

- 4 1. Appeal of the Sterling stay relief order which is pending;
- 5 2. Motion to limit or object to the SBA standing to be heard in this case;
- 6 3. Rule 2004 examinations of Sterling and the SBA; and
- 7 4. Sterling's objection to the KMTP claim.

## 8 **II. Conclusion**

9 This case should be dismissed. If appropriate, the Debtor is prepared to file, set for  
10 hearing and serve a dismissal motion within seven days of the date hereof.

11 Dated: June 15, 2011

PINNACLE LAW GROUP LLP

12  
13 By: /s/ Matthew J. Shier

14 Matthew J. Shier, Attorneys for  
15 TV-32 DIGITAL VENTURES INC., Debtor  
16 and Debtor-in-Possession  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **CERTIFICATE OF SERVICE**

2 I am employed in the office of a member of the bar of this Court in the City and County of  
3 San Francisco, at whose direction this service was made. I am over the age of 18 and not a party  
4 to the within action. My business address is 425 California Street, Suite 1800, San Francisco,  
5 California 94104.

6 On June 15, 2011, I served the documents described as:

7 **DEBTOR'S CHAPTER 11 STATUS CONFERENCE STATEMENT**

8 on the interested parties in this action by placing [ ] the original [X] true copies thereof enclosed  
9 in sealed envelopes addressed as follows:

10 Arlene Stevens  
11 P.O. Box 51310  
12 Palo Alto, CA 94303  
13 [prevalere@hotmail.com](mailto:prevalere@hotmail.com)  
14 [arlenestevens46@hotmail.com](mailto:arlenestevens46@hotmail.com)

Arlene D. Stevens  
3575 Tripp Road  
Woodside, CA 94062-3635

15 Capital Business Group, Inc.  
16 d/b/a Capital Access Group  
17 150 California Street, Suite 250  
18 San Francisco, CA 94111-4526

TV-32 DIGITAL VENTURES INC.  
c/o Booker T. Wade  
605 Forest Avenue  
Palo Alto, CA 94301

19 **Attention: CHAMBERS COPIES**

20 The Honorable Arthur S. Weissbrodt  
21 United States Courthouse, Room 3020  
22 280 South First Street  
23 San Jose, CA 95113-3099

24 [X] U.S. MAIL: Service was accomplished by placing the document(s) listed above in a  
25 sealed envelope with postage thereon fully prepaid, in the United States mail at San  
26 Francisco, California, addressed as set forth above.

27 [X] BY E-MAIL: On the date stated above, I transmitted such document(s) by electronic mail  
28 to the persons listed above at the electronic notification address listed above. The  
transmission was reported as complete and without error.

[X] BY E-MAIL/NEF: Service was accomplished through the Notice of Electronic Filing  
("NEF") for parties and counsel who are registered ECF Users.

William J. Healy on behalf of Creditor Arlene Stevens  
[whealy@campeaulaw.com](mailto:whealy@campeaulaw.com)

Edwin L. Joe on behalf of Attorney US Attorney's Office  
[edwin.joe@sba.gov](mailto:edwin.joe@sba.gov)

John L. Mlnarik on behalf of Requestor The Mlnarik Law Group, Inc.  
[john@mlnariklaw.com](mailto:john@mlnariklaw.com), [mlnariklawecfnoficescanb@gmail.com](mailto:mlnariklawecfnoficescanb@gmail.com)

Office of the U.S. Trustee / SJ  
[USTPRegion17.SJ.ECF@usdoj.gov](mailto:USTPRegion17.SJ.ECF@usdoj.gov), [ltroxas@hotmail.com](mailto:ltroxas@hotmail.com)

1 Rachel K. Stevenson on behalf of Creditor Sterling Savings Bank  
2 [rnunes@abbeylaw.com](mailto:rnunes@abbeylaw.com)

3 I declare under penalty of perjury under the laws of the United States of America, that the  
4 foregoing is true and correct. Executed on June 15, 2011, at San Francisco, California.

5 /s/ Mike Terry

6 MIKE TERRY  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28